U.S. Department of Transportation
Office of the Secretary of Transportation

General Counsel

400 Seventh St., S.W.
Washington, D.C. 20590

June 6, 2007

Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th Street, S.W.
Room TW –A325
Washington, D.C. 20554

Re: CC Docket No. 92-105

Dear Ms. Dortch:

Pursuant to the Public Notice released May 7, 2007 in the above-referenced proceeding, enclosed are the Comments of the United States Department of Transportation in this matter. Please contact me if you have any questions.

PAUL SAMUEL SMITH
Senior Trial Attorney

(202) 366-9280

Enclosure

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
Designation of 211 and 511 as Abbreviated Dialing Arrangements	)	CC Docket No. 92-105

COMMENTS OF THE UNITED STATES DEPARTMENT OF TRANSPORTATION

Introduction

In furtherance of its Intelligent Transportation System ("ITS") initiative, in 1999 the United States Department of Transportation ("DOT" or "Department") petitioned the Federal Communications Commission ("FCC" or "Commission") to assign an abbreviated telephone dialing code for the provision of travel information services. Petition of the U.S. Department of Transportation, filed March 8, 1999 ("DOT Petition"). [1] The record compiled at the time showed that a nationwide three-digit code devoted to this purpose would encourage the establishment and use of systems offering up-to-date information on traffic volume, roadway conditions, accident sites, and so forth. [2] Knowledge of such factors would lead to superior travel and

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[1]/ Simply put, the Department's ITS program is a comprehensive effort to maximize the benefit of the existing transportation infrastructure through technology. See DOT Petition at 1-5, 8-10.

[2]/ The following overview of the experience a caller to 511 may expect is taken from the website of DOT's Federal Highway Administration ("FHWA"). Until recently FHWA was responsible for overseeing the Department's ITS program, including 511. That responsibility has now been undertaken by another agency within DOT, the Research and Innovative Technology Administration ("RITA"), although FHWA continues to provide significant support.

How does a typical 511 program work?
A 511 system relies on intelligent transportation systems technologies to collect and disseminate traveler information. Callers access the service by dialing 511 from any telephone. They hear a menu of available information on highways and public transit and indicate their choices by using the telephone's touchpad or, for systems with voice recognition technology, by voice. Some 511 systems offer premium services such as personal routing instructions or reservation services, which may involve additional charges.

routing decisions, thereby reducing delay, fuel consumption, congestion, etc. See, e.g., DOT Petition at 10-16. The FCC subsequently granted the petition and assigned the code of 511. [3]

Because abbreviated dialing codes comprise a very scarce numbering resource, they are only allocated in order to secure substantial public benefits. 211/511 Assignment Order at ¶¶ 1 – 3. Thus, in its Order the Commission urged DOT "to facilitate ubiquitous deployment of 511" (Id. at ¶ 15), and promised to reassess this assignment in the future in order to ensure that the 511 code was actually providing such benefits through widespread use. Id. at ¶¶ 10, 14, 16. The FCC has now begun that reassessment by seeking comments. Public Notice dated May 7, 2007.

Since the Commission's Order the Department, together with the transportation, information, and communications communities, has striven to implement and expand the deployment of 511 travel information services across the country. Access to these services is now available in most states. Tens of millions of calls have been placed to 511 to improve travelers' journeys and make better use of resources. And more 511 systems come "on line" with regularity. DOT is pleased to take this opportunity to apprise the FCC about the current extent of implementation and use, and the prospects for future growth, of 511 travel information systems and their public benefits.

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[3]/ Petition by the United States Department of Transportation for Assignment of an Abbreviated Dialing Code (N11) to Access Intelligent Transportation System (ITS) Services Nationwide; Request by the Alliance of Information and Referral Systems, United Way of America, United Way 211 (Atlanta, Georgia), United Way of Connecticut, Florida Alliance of Information and Referral Services, Inc., and Texas I&R Network for Assignment of 211 Dialing Code; The Use of N11 Codes and Other Abbreviated Dialing Arrangements, NSD-L-99-24; NSD-L-98-80; CC Docket No. 92-105, Third Report and Order and Order on Reconsideration, 15 FCC Rcd 16753 (2000) ("211/511 Assignment Order" or "Order").

Fostering Deployment of 511

Following the Commission's Order, the Department met with interested stakeholder groups representing state departments of transportation, public transportation agencies in the country's metropolitan areas, ITS systems providers, and telecommunications interests to create an umbrella organization to plan how best to promote 511-based information services. [4] The National 511 Deployment Coalition ("Coalition") was the result; it developed guidelines that provide a common overall framework, provided technical assistance and guidance for use by public agencies and private contractors in designing and implementing 511 services. The Coalition also defined the core data set for the traveler information services to be offered nationwide via the 511 dialing code.

The Coalition has conducted three national conferences to facilitate the exchange of information and experience among actual and potential 511 system providers and users. The Coalition also tracks use of 511 across the country by gathering call and usage statistics from the locations that have implemented 511 services. Most fundamentally, the Coalition provides an ongoing forum for discussion and networking among those interested in 511 services, including resources on design, procurement, operations, marketing, and systems evaluation. Information about the Coalition, its services, and the extent of 511 implementation and use is on the internet at: http://www.deploy511.org. [5]

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[4]/ Respectively, these organizations are the American Association of State Highway and Transportation Officials ("AASHTO"), the American Public Transportation Association ("APTA"), and the Intelligent Transportation Society of America ("ITS America"). With support from DOT, they form the leadership of the Coalition. Telecommunications entities such as the United States Telecom Association, CTIA – The Wireless Association, and SBC/Ameritech also actively participated in the Coalition during the initial development of 511 services.

[5]/ FHWA also continues to maintain a website providing information on 511 services. It is accessible via the following link: http://ops.fhwa.dot.gov/511/index.htm.

The Department has also provided funding in order to assist states in implementing 511 services. From 2001 through 2005, FHWA offered up to $100,000 to each state department of transportation to use in identifying and addressing issues related to implementing 511, and in planning and designing 511 services specific to their circumstances. Of the 52 agencies that were eligible for the funding (all 50 states plus the District of Columbia and Puerto Rico), 47 applied for and received financial assistance.

Finally, DOT has promoted implementation of 511 travel information services through a model deployment project in Arizona. This project served to evaluate various components or aspects of 511 services in that state (such as the use of voice recognition technology and the importance of marketing), in the interest of enhancing efficiencies and operations, improving the user experience, and generally refining existing and future 511 systems. [6]

The Extent of 511 Systems and Their Use

The results of these efforts have been impressive. [7] Access to 36 traveler information services covering all or parts of 29 states is now available to 112 million Americans using the 511 dialing code. Many 511 systems extend throughout an entire state (e.g., Virginia, Louisiana, Oregon), while others cover regions within a state, usually by metropolitan area (e.g., in Florida there are separate 511 operations in Orlando, Tampa Bay, Jacksonville, the greater Miami-Dade / Fort Lauderdale / West Palm Beach metropolitan areas, and Southwestern Florida, but the remainder of the state is also covered). Not surprisingly, more complex circumstances, such as

[6]/ The evaluation report from the model deployment project is available as publication number FHWA-JPO-06-013 and electronic report number 14248; it may also be found on-line at http://www.itsdocs.fhwa.dot.gov/JPODOCS/REPTS_TE/14248.htm.

[7]/ The statistics that follow in this section are all taken from the 511 Deployment Coalition website.

metropolitan areas that span multiple states, commonly entail greater planning and cooperation among public and private entities. Nonetheless, in every case these systems are designed and coordinated so as to be transparent to users; callers gain access to travel information services pertinent to their calling locations regardless of their telephony platform or carrier. The table below indicates the systems that are currently providing transportation information services through 511 and the dates that they began operating.

Cincinnati-Northern Kentucky – 6/11/01	Nebraska – 10/1/01
Utah – 12/18/01	Virginia – 2/15/02 (I-81) & 2/15/05 (statewide)
Arizona – 3/20/02	Minnesota – 7/1/02
Orlando/I-4 Corridor – 7/16/02	Southeastern Florida/Miami – 7/16/02
South Dakota – 11/18/02	Iowa – 11/22/02
Kentucky – 11/26/02	San Francisco Bay area – 12/6/02
Montana – 12/12/02	North Dakota – 2/10/03
Alaska – 4/25/03	Maine – 5/5/03
New Hampshire – 5/15/03	Washington – 7/10/03
Vermont – 10/7/03	Oregon – 12/10/03
Kansas – 1/15/04	North Carolina – 8/25/04
Sacramento-Northern California – 9/1/04	Tampa – 9/2/04
Rhode Island – 3/9/05	Colorado – 5/05
Florida (statewide) – 11/17/05	Idaho – 11/21/05
Wyoming – 7/1/06	Tennessee – 8/14/06
Nevada – 11/16/06	Louisiana – 12/27/06
Jacksonville – 1/14/07	Southwestern Florida – 2/07
San Diego – 2/21/07	St. Louis – 5/11/07

There is every reason to expect continued expansion. The states of Georgia, Massachusetts, New Jersey, and New Mexico plan to begin 511 operations later this year. This will result in more than one-half of the nation's population having access to such systems by the end of the calendar year. Connecticut, Pennsylvania, Texas, and Michigan, plan to issue procurement proposals for 511 services in the coming months. New York, Illinois, and Wisconsin anticipate launching their 511 services in 2008.

The growing geographic reach of operating 511 travel information services reflects their increasing use. Total usage has grown from roughly 650,000 calls in the year 2001 to almost 22 million calls in 2006. Combined, 511 systems receive an average of between 1.5 and 2 million calls per month, for a total of 73,124,150 calls placed to 511 through February 2007. [8]

As the initial record compiled in this proceeding established, greater use of travel information leads to greater public benefits, in the form of reduced congestion, fuel consumption, vehicular emissions, delays, etc. The reasoning was and is simple: A three-digit telephone access code, uniform across the nation, is easy to remember and invites greater use. DOT Petition at 16-19; 211/511 Assignment Order at ¶¶ 12-14. The record developed since then continues to bear this out.

The future looks promising from yet another perspective as well. The Department's efforts on behalf of 511 go beyond widespread deployment alone; they include enhancements to the information provided via these systems in order to maximize their use and benefits. An evaluation of the 511 system in place in Salt Lake City found that commuters using this travel information service arrived at their destinations on-time 14 percent more often than non-users, which amounted to a time-value savings of $172 per year per user. [9] That study also projected that if accurate trip travel time estimates were added to the array of information already available, on-time arrivals would climb to 30 percent more often for users, with concomitant time-value savings. Larger cities with greater congestion could expect still more savings overall.

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[8]/ December 2006 was the first month to record over 3 million calls and preliminary statistics for 2007 show that roughly 10 million calls have been answered through April.

[9]/ Vasudevan, et al., Mobility and Stress Reduction Impacts of 511 Deployment in Salt Lake City, Utah. Prepared for the Federal Highway Administration by Mitretek Systems. August 2006.

DOT has invested $100 million in an ITS project called the Vehicle Infrastructure Integration ("VII") initiative to, *inter alia*, make just such high quality, real-time information available. [10]

Last but hardly least, Congress, too, has recognized the value of 511 travel information systems. In the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users, ("SAFETEA-LU"), Congress endorsed continued progress on the Department's ITS program generally, and specifically instructed DOT to order its funding priorities so as to meet the goal that "a national, interoperable 5-1-1 system ... is fully implemented for use by travelers throughout the United States by September 30, 2010". Pub.L. 109-59, sec. 5306(b)(3)(B), 119 Stat. 1809. The Department has every intention of fulfilling this directive.

Conclusion

Since the Commission assigned the abbreviated dialing code of 511 for travel information purposes, 511 services have expanded and grown across the nation. Call volumes and use of 511 services continue to increase, as do the public benefits. The FCC's exhortation that access to 511 information services be "ubiquitous" has become the Congressional goal of nationwide

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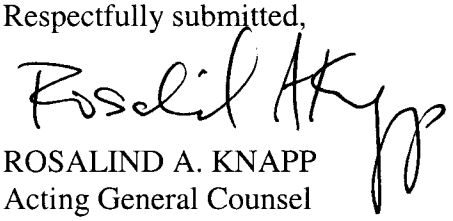
[10]/ VII is a set of advanced technologies, systems, and services that allows for standardized, wireless communications both between vehicles and the roadside infrastructure as well as between individual vehicles that offers dramatic improvement in both safety and mobility. For an overview of VII see http://www.its.dot.gov/vii/vii_overview.htm. The Commission has already fostered VII's basic enabling technology, the Dedicated Short-Range Communications ("DSRC") system. See, e.g., *In the Matter of Amendment of Parts 2 and 90 of the Commission's Rules to Allocate 5.850-5.925 GHz Band to the Mobile Service for Dedicated Short Range Communications of Intelligent Transportation Services*, ET Docket No. 98-95, Report & Order, 14 FCC Rcd18221 (1999).

deployment. Both are well on the way to being met. There is every reason for the Commission to affirm the determination it made seven years ago: "that there are substantial public benefits in assigning 511 for nationwide access to travel information services." Order at ¶ 10.

Respectfully submitted,



ROSALIND A. KNAPP
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